

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	12-MJ- 3013-KPN
)	
)	
v.)	
)	
)	
RONALD BROWN,)	
)	
Defendant.)	

**GOVERNMENT'S MOTION FOR PRETRIAL DETENTION
OF DEFENDANT RONALD BROWN
PURSUANT TO 18 U.S.C. §§ 3142(e) and (f)**

The United States of America, by and through its counsel, Carmen M. Ortiz, United States Attorney for the District of Massachusetts and Steven H. Breslow, Assistant United States Attorney (the "Government"), moves for pretrial detention of defendant, pursuant to 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because it involves (check all the apply):

- ☒ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☐ 10 plus years drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☒ Serious risk of obstruction of justice

2. Reason for Detention. The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

- ☒ Defendant's appearance as required

X Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant under U.S.C. § 3142(e)(3)(E). The presumption applies because probable cause exists to believe that defendant committed an offense involving a minor victim under 18 U.S.C. § 2251(a) (Production Of Material Involving Sexual Exploitation Of A Minor).

4. Time for Detention Hearing.

The United States requests the court conduct the detention hearing after continuance of three days. 18 U.S.C. § 3142(f).

5. Witnesses.

The United States has not yet determined whether to call witnesses.

6. Other Matters.

None.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

/s/ Steven H. Breslow
STEVEN H. BRESLOW
Assistant United States Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
February 1, 2013

I, Steven H. Breslow, Assistant U.S. Attorney, hereby certify that the foregoing was filed by ECF and will be served by ECF to the registered participants as identified on the Notice of Electronic Filing.

/s/ Steven H. Breslow
STEVEN H. BRESLOW
Assistant United States Attorney